UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK		
	X	
THE BASU GROUP INC.,	:	
Plaintiff,	:	Civil Action No. 16 Civ. 461 (PGG)
v.	:	
SEVENTH AVENUE, INC.	:	JURY DEMANDED
Defendant.	: : X	

PLAINTIFF THE BASU GROUP INC.'S ANSWER TO DEFENDANT'S AMENDED COUNTERCLAIMS

Plaintiff The Basu Group Inc. ("Plaintiff") by and through its undersigned counsel hereby files its Answer to defendant Seventh Avenue, Inc.'s Counterclaims, as follows:

1. Plaintiff denies it only "purports" to own its asserted copyright registration, as Plaintiff, in fact, owns its copyright registration. All other allegations contained in paragraph 1 of the Defendant's Counterclaims are admitted.

THE PARTIES

- 2. Admitted.
- 3. Admitted that Plaintiff is a corporation of the State of New Jersey at the stated address. Denied that Plaintiff is only the "alleged proprietor" of the copyright asserted in this Action, when Plaintiff is the actual proprietor of the asserted copyright.

JURISDICTION AND VENUE

- 4. Admitted.
- 5. Admitted that venue is appropriate in this judicial district, and denied as to all remaining allegations.

COUNT I

- 6. Plaintiff repeats and realleges its responses to paragraphs 1-5, as if fully set forth herein.
- 7. Admitted that what purports to be a copy of Plaintiff's asserted copyright registration is attached as Defendant's Exhibit A. Plaintiff lacks information sufficient to form a belief as to the truth of the remaining allegations, and therefore denies the same.
- 8. Plaintiff lacks information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.
 - 9. Denied.
- 10. Plaintiff lacks information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.
- 11. Plaintiff lacks information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.
- 12. Admitted that an application to register Plaintiff's work was filed with the U.S. Copyright Office. Otherwise, Plaintiff lacks information sufficient to form a belief as to the truth of the remaining allegations, and therefore denies the same.
- 13. Plaintiff lacks information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.
- 14. Admitted that Plaintiff did not disclose the images of Exhibit B to the Copyright Office. Otherwise, denied.
 - 15. Denied.
 - 16. Denied.
 - 17. Denied.

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19. Denied.

COUNT II

- 20. Plaintiff repeats and realleges its responses to paragraphs 1 19, as if fully set forth herein.
 - 21. Denied.
 - 22. Denied.
 - 23. Denied.

COUNT III

- 24. Plaintiff repeats and realleges its responses to paragraphs 1-23, as if fully set forth herein.
 - 25. Denied.
- 26. Plaintiff lacks information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. Also denied as calling for a legal conclusion.

WHEREFORE, Plaintiff, by its below counsel, prays that:

- A. Defendant takes nothing by way of its Counterclaims;
- B. Judgment be entered in this action in favor of Plaintiff, based on Plaintiff's Complaint, and against Defendant;
 - C. Plaintiff be awarded its costs, expenses and attorneys' fees in this action; and

D. Plaintiff be awarded such other and further relief as the Court deems just and proper.

KAPLAN BREYER SCHWARZ & OTTESEN LLP

Attorneys for Plaintiff 100 Matawan Road, Suite 120 Matawan, New Jersey 07747 Telephone (732) 578-0103, ext. 233

Dated: March 22, 2017 By: /Michael R. Gilman/

Michael R. Gilman (MG 7608) mgilman@kbsolaw.com

CERTIFICATE OF SERVICE

It is hereby certified that a true and correct copy of the above subject document was served on the below identified counsel for Defendant, on this 22nd day of March, 2017, via ECF, with a courtesy copy by email:

Ralph H. Cathcart, Esq.
Ladas & Parry LLP
1040 Avenue of the Americas
New York, NY 10018
(Attorneys for Defendant Seventh Avenue, Inc.)

and

David C. Brezina, Esq. Ladas & Parry LLP 224 South Michigan Avenue, Suite 1600 Chicago, IL 60604 (Attorneys for Defendant Seventh Avenue, Inc.)

Dated: March 22, 2017 By: /Michael R. Gilman/

Michael R. Gilman (MG 7608)